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Remarks

The present response is responsive to the Office Action of March 9, 2006. Reexamination and reconsideration of claims 1-10, 12-19 and 21-23 is respectfully requested.

Summary of The Office Action

Claims 12-19 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 6,115,739 to Ogawa et al.

Claims 1-9 and 21-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of U.S. Patent 6,115,739 to Ogawa and U.S. Patent 6,930,709 to Creamer et al.

Claim 10 was rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of Ogawa and Creamer and further in view of U.S. Patent 6,182,892 to Angelo et al.

Response

Applicants' representative acknowledges the lengthy discussion presented in the Office Action mailed March 9, 2006 with respect to (1) firmware residing in the scanner, and, (2) the phrase "link reference". With respect to the firmware discussion, the 103 rejection based on Ogawa in view of Melen has been withdrawn. The new 102 rejection of claims 12-19 based on Ogawa is addressed below.

Regarding the "linked reference" discussion, the Office Action maintains that "it should be clear that the user IDs [of Ogawa] and their relationships of correspondence to the associated directories clearly reads on the term 'link reference'". Office Action at p. 6. Applicants' representative respectfully submits that the interpretation of the phrase "link reference" set forth in the Office Action is incorrect for at least the following reasons.

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Ogawa teaches a file for associating the data items with the directories is created in a designated directory by the administration software. (Ogawa, Col. 4, lines 34-36). Each user of the image scanner registers his/her own ID information in a directory associative file shown in Fig. 4 in advance. (Ogawa, Col. 4, lines 46-48, emphasis added). Thus, at the point in time of image scanning, the directory associative file is static in nature: "said file server includes directories which are created in advance in one-to-one correspondence to users and in which image data read by said image scanner is stored". (Ogawa, Col. 2, lines 32-35, emphasis added).

The scanner of Ogawa does not store any information in the directory associative file – it is merely a consumer of information previously stored in the directory associative file. Based on the information previously stored in the directory associative file (e.g., user ID to directory association), the file server of Ogawa stores the image data in a directory associated with identification information input from the scanner. (See, Ogawa, Col. 2, lines 39-41).

Contrary to the statically stored associative information of Ogawa, the "link reference" of the subject application is a reference to imaging data that is obtained by the scanning device that the scanning device in turn stores to facilitate locating of the imaging data. See, Fig. 3. Therefore, for example, referring to Fig. 3, at block 116, the "scanning device transfers imaging data to the imaging data store." Thereafter, at block 118, the "scanning device obtains reference to transferred imaging data stored in the imaging data store." (Emphasis added).

At block 130 the "scanning device adds link to imaging data store in imaging composition". (Emphasis added). The corresponding portion of the detailed description provides: "[a]fter a successful connection to the composition store (block 124), the scanning device creates an imaging composition (block 128) and adds the reference to the imaging data stored in the imaging data store obtained earlier in the imaging composition (block 130)". (Page 13, line 26 – page 14, line 2, emphasis added).

Thus, the "link reference" of the subject application is a reference to imaging data obtained and stored by the scanning device. The link reference is stored in a

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composition store (e.g., centralized store), with the imaging data stored in an imaging data store. Accordingly, contrary to the Office Action (page 5), one of ordinary skill in the art would not equate a user ID (of Ogawa) with a link reference and further Ogawa provides no suggestion or motivation to believe otherwise. Furthermore, the interpretation in the Office Action is not consistent with the present specification or the claims.

The claim rejections will be addressed in light of this clear distinction between the User ID of Ogawa and the "link reference" of the subject application.

The Claims Patentably Distinguish Over the References of Record

Independent Claim 1

Claim 1 recites a device firmware being part of a scanning device configured to store a link reference to scanned imaging data in a centralized data store associated to a particular user. The imaging data is stored in a personal imaging repository. Ogawa and Creamer both fail to teach, suggest or make obvious this feature and thus claim 1 patentably distinguishes over the references of record.

Ogawa teaches an image scanner adapted for direct connection to client/server type network. (Ogawa, Title). A file server includes directories which are created in advance in one-to-one correspondence to users. (Ogawa, Abstract). A file for associating the data items with the directories is created in a designated directory by the administration software. (Ogawa, Col. 4, lines 34-36). Each user of the image scanner registers his/her own ID information in the directory associative file shown in Fig. 4 in advance. (Ogawa, Col. 4, lines 46-48, emphasis added). When image data is input from the image scanner, the file server stores the image data in a directory associated with identification information input from the image scanner. (Ogawa, Abstract).

Significantly, the scanner of Ogawa does not store any information in the directory associative file as it is merely a consumer of information previously stored in the directory associative file. Further, the scanner of Ogawa does not store a link

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reference to imaging data – the scanner provides the imaging data to the file server which stores the imaging data in a directory. The user ID (of Ogawa) inputted by a user is not stored by the scanner. Thus, the User ID is not processed like the claimed link reference and does not function like the claimed link reference. Therefore, the claimed system recited in claim 1 is not taught or suggested by Ogawa.

Creamer teaches an integrated Internet/intranet camera. (Creamer, Title). Upon capturing the digital image, the camera initiates a connection to the Internet, connects to the destination user directory, and uploads the digital images. (Creamer, Abstract). Thereafter, the digital images are available to authorized (or any) user having access to the Internet. (Creamer, Abstract). The camera of Creamer does not store a link reference to imaging data – the camera connects to the destination user directory and uploads the digital images. Thus, Creamer fails to teach, suggest or make obvious storing a link reference to imaging data as recited in claim 1, and fails to cure the shortcomings of Ogawa.

Next, dependent claim 10 was rejected as being obvious over the combination of Ogawa and Creamer in view of Angelo. Angelo teaches a fingerprint authentication methodology in which a smart card with a credit card form factor is used to transmit the imprint of a fingerprint to a live-scan device. (Angelo, Abstract). Angelo does not teach storing a link reference to imaging data. Thus, Angelo fails to teach, suggest or make obvious storing a link reference to imaging data as recited in claim 1 (from which claim 10 depends), and fails to cure the shortcomings of Ogawa and Creamer.

Ogawa, Creamer and Angelo, individually or in combination, fail to teach, suggest or make obvious the claimed scanning device including firmware for storing a link reference to imaging data in a centralized store associated to a particular user as recited in claim 1. Since claim 1 recites features not disclosed or suggested by the references, alone or in combination, claim 1 patentably distinguishes over the references of record and is now in condition for allowance. Accordingly, dependent claims 2-10 also patentably distinguish over the references and are in condition for allowance.

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Independent Claim 12

Claim 12 recites storing by the scanning device, in a composition store associated to a user, a link reference that identifies a location of the scanned imaging data where the composition store maintains a plurality of link references to a plurality of imaging data that may be stored in separate imaging data stores. Ogawa fails to teach or suggest this feature and thus claim 12 patentably distinguishes over the reference of record.

As discussed in greater detail above, the scanner of Ogawa does not store a link reference to imaging data – the scanner provides the imaging data to the file server which stores the imaging data in a directory. The scanner of Ogawa does not store any information in the directory associative file as it is a consumer of information previously stored in the directory associative file. The User ID of Ogawa is not stored as claimed and thus does not teach or suggest storing a link reference.

Ogawa fails to teach or suggest storing by a scanning device a link reference that identifies a location of scanned imaging data as recited in claim 12. Since claim 12 recites features not disclosed or suggested by the reference, claim 12 patentably distinguishes over the references of record and is now in condition for allowance. Accordingly, dependent claims 13-19 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 21

Claim 21 is directed to a computer program product that when installed in a scanning device causes the scanning device to transfer a link to a composition store associated with a user, the composition store being configured to contain link references to a plurality of image data associated with the user that may be stored in different imaging data stores on remote devices. Ogawa and Creamer both fail to teach, suggest or make obvious this feature and thus claim 21 patentably distinguishes over the references of record.

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The scanner of Ogawa does not store a link reference to imaging data as the scanner provides the imaging data to the file server which stores the imaging data in a directory. Further, the scanner of Ogawa does not store any information in the directory associative file as it is a consumer of information previously stored in the directory associative file. Thus, Ogawa does not teach, suggest or make obvious a scanning device that transfers a link to a composition store associated with a user, the composition store configured to contain link references to a plurality of image data.

The integrated Internet/intranet camera of Creamer initiates a connection to the Internet, connects to the destination user directory, and uploads the digital images. (Creamer, Abstract). Thereafter, the digital images are available to authorized (or any) user having access to the Internet. (Creamer, Abstract). The camera of Creamer does not transfer a link to a composition store associated with a user, the composition store configured to contain link references to a plurality of image data – the camera connects to the destination user directory and uploads the digital images. Thus, Creamer fails to teach, suggest or make obvious a scanning device that transfers a link to a composition store associated with a user, the composition store configured to contain link references to a plurality of image data as recited in claim 21, and fails to cure the shortcomings of Ogawa.

Ogawa and Creamer fail to teach, suggest or make obvious a scanning device that transfers a link to a composition store associated with a user, the composition store configured to contain link references to a plurality of image data as recited in claim 21. Since claim 21 recites features not disclosed or suggested by the references, alone or in combination, claim 21 patentably distinguishes over the references of record and is now in condition for allowance.

Independent Claim 22

Claim 22 is directed to a computer program product comprising readable program codes that when executed causes a scanning device to perform a method, the method comprising obtaining a link reference to scanned image data transferred to an image data store; and causing the link reference to be stored in a composition store identified by the composition store reference where the composition store can be

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accessed by a plurality of remote web services to identify locations of scanned image data associated with the user. (Emphasis added). Ogawa and Creamer both fail to teach, suggest or make obvious these features and thus claim 22 patentably distinguishes over the references of record.

The scanner of Ogawa does not obtain a link reference to scanned image data. Further, the scanner does not store a link reference to imaging data. Instead, the scanner provides imaging data to a file server that stores the imaging data in a directory based on a user ID. Thus, Ogawa does not teach, suggest or make obvious a method that obtains a link reference to scanned image data and causes the link reference to be stored in a composition store.

Creamer fails to cure the shortcomings of Owaga. As discussed above, the camera of Creamer initiates a connection to the Internet, connects to the destination user directory, and uploads the digital images. (Creamer, Abstract). Thereafter, the digital images are available to authorized (or any) user having access to the Internet. (Creamer, Abstract). The camera of Creamer does not obtain a link reference to scanned image data. Further, the camera does not store a link reference to imaging data. Thus, Creamer does not teach, suggest or make obvious a method that obtains a link reference to scanned image data and/or causes the link reference to be stored in a composition store.

Ogawa and Creamer fail to teach, suggest or make obvious a scanning device that transfers a link to a composition store associated with a user, the composition store configured to contain link references to a plurality of image data as recited in claim 22. Since claim 22 recites features not disclosed or suggested by the references, alone or in combination, claim 22 patentably distinguishes over the references of record and is now in condition for allowance. Accordingly, dependent claim 23 also patentably distinguish over the references and are in condition for allowance.
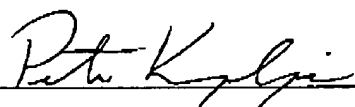
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Conclusion

For the reasons set forth above, **claims 1-10, 12-19** and **21-23** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,

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